

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

1251 Avenue of the Americas
New York, NY 10020

**STOLL STOLL BERNE LOKTING &
SHLACHTER, P.C.**

209 SW Oak Street, Suite 500
Portland, OR 97204

MICHAEL D. BLATCHLEY
michaelb@blbglaw.com
(212) 554-1281

KEITH S. DUBANEVICH
KDubanevich@stollberne.com
(503) 972-7120

June 28, 2019

VIA ECF AND HAND DELIVERY

Honorable Michael J. Davis
United States District Court
U.S. Courthouse, Suite 13E
300 South Fourth Street
Minneapolis, MN 55415

Re: *In re CenturyLink Sales Practices and Sec. Litig.*, No. 0:17-md-02795-MJD-KMM;
Craig v. CenturyLink, Inc., No. 0:18-cv-00296-MJD-KMM (“*Craig*”)

Dear Judge Davis:

We represent Lead Plaintiff Oregon in the CenturyLink securities action. We write to apprise the Court of two recent decisions in the Minnesota Attorney General’s action against CenturyLink. First, on June 25, 2019, District Court Judge Bethany A. Fountain Lindberg granted the State’s motion for sanctions and ordered CenturyLink to produce to the State information relating to the audits referenced in Oregon’s Complaint showing that CenturyLink potentially overbilled one-third to half of its customers. *See, e.g.*, ¶¶1-2, 5, 65, 178, 184, 186; Ex. A at 1-2. Second, the court also largely denied Defendants’ motion to keep information about these audits and the number of customers CenturyLink overbilled under seal. Ex. B at 1-2. As a result, the State’s complaint now reveals, based on CenturyLink’s own internal documents, that the Company “fraudulently over-billed consumers in 46% of its sales transactions” (Ex. C ¶40)—a number that strongly corroborates Lead Plaintiff’s allegations concerning CenturyLink’s internal audits, the highly material nature of the Company’s cramming violations, and Defendants’ knowledge of these practices. *See, e.g.*, ¶¶1-2, 5, 13, 65, 178, 181, 184, 186.

We thank the Court for its attention to this matter and welcome the opportunity to address any questions the Court may have.

Respectfully submitted,


Michael D. Blatchley


Keith S. Dubanevich

Counsel for Lead Plaintiff Oregon and Lead Counsel for the Class

Enclosures

cc: Gregg M. Fishbein
Lockridge Grindal Nauen PLLP
Liaison Counsel for Oregon
All attorneys of record (via ECF)